

**REMARKS**

Applicants submit these remarks in response to the Office Action, dated March 9, 2007. Currently, claims 1-37 are pending in the application with claims 1, 10, 19, 24 and 25 being independent.

35 U.S.C. 102(e)

In the March 9, 2007 Office Action, the Examiner rejected of claims 1-9, 19-23, and 25 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,493,110 to Roberts (hereinafter, "Roberts"). These rejections are respectfully traversed.

In the Office Action, the Examiner stated that:

Roberts teaches downloading transaction information (downloaded advertisement with a barcode, that includes transaction data such as redemption amount, expiration or term of offer; identity of coupon holder, issuer, etc (see col. 6 line 64 to col. 7 line 15, col. 18, lines 44-63); downloading the image from a remote location (see fig. 1 personal computer) retrieving an image associated with the transaction information (see fig. 5, col. 7 lines 16-28); converting the image into a pixels matrix representations and printing at least one scan line corresponding to pixel matrix or converting the image into gray scale or dithered black and white pixel matrix (see col. 7 lines 30-40, col. 18 line 63 to col. 19 lines 30, col. 19 line 60 to col. 20 line 31). (Office Action, page 2).

Claim 1 recites a method of printing a receipt which includes an image, comprising downloading transaction information; retrieving an image associated with the transaction information; converting the image into a pixels matrix representation; and printing at least one scan line by selectively printing pixels corresponding to the pixel matrix representation.

Roberts discloses a system and a method for bar code rendering and recognition. Specifically, Roberts describes formatting data into a readable bar code format. Roberts' bar

codes are used in transaction applications, such as in redemption and tracking of coupons, where the bar code image represents one or more transaction data. (Roberts, Col. 6, line 65 to Col. 7, line 1). The transaction data includes redemption amount, expiration or term of offer, identity of coupon holder, etc. (Roberts, Col. 7, lines 1-15 and Col. 18, lines 44-63). Thus, Roberts' bar code transaction data relates to the coupon only rather than to a transaction information that is being downloaded, as recited in claim 1. Roberts further generates coupons with a coupon data management program that uses a computer to request coupon data from the centrally located repository, which stores the coupon data and transmits it for printing. (Roberts, Col. 8, lines 43-48). Roberts' system employs a document management module that generates coupons. (Roberts, Col. 7, lines 12-20). Roberts' bar code is encoded with user specific information, such as user name and/or other unique identification criteria such as a social security number or online services address (Roberts, Col. 11, lines 54-57). Also, Roberts' coupons are based on demographic data and historic buying profiles stored in the demographic data file. (Roberts, Col. 12, lines 44-47).

As stated previously, Roberts fails to disclose downloading transaction information, as recited in claim 1. Instead, Roberts discloses coupons with a bar code that encodes transaction data relating exclusively to the coupon (e.g., redemption amount). Roberts does not download any transaction information related to a transaction. Further, Roberts does not deal with transactions, instead it deals with printing coupons embedded with coupons information and user-specific information, as opposed to a transaction information. Roberts requests certain coupons based on a unique user identification information, which is unrelated to the downloaded transaction information recited in claim 1. In fact, Roberts selects coupons from coupon packages 40. (Roberts, Col. 11, lines 13-25). The coupon packages are generated based on user

specific data relating to coupons, such as, coupons selected data, coupons deleted data, coupons printed data as well as user demographics (e.g., user's name, social security number, etc. (Roberts, Col. 11, lines 54-57)). Roberts also performs a marketing analysis based on this information to generate coupon packages. (Roberts, Col. 11, lines 13-25; Col. 12, lines 8-11 and lines 42-49). This information does not relate to a transaction, rather it relates to user demographics and purchasing profiles, contrary to the Examiner's suggestion and the recitation of claim 1. In the Office Action, the Examiner mistakenly concludes that "[Roberts'] coupon package, which is downloaded to the user computer, includes transaction information." (Office Action, page 7). As stated above, Roberts' coupon packages include coupons that are printed and that include bar codes having information about the coupon (e.g., redemption amount) and/or the user, but they do not include transaction information. The disclosure of Roberts is different from the recitation of claim 1, where a receipt's image is printed based on transaction information relating to a transaction, rather than pre-stored user identification information. Additionally, Roberts allows users to access an online database in order to obtain coupon data related to an advertised product (Roberts, Col. 17, lines 52-55). Hence, no transaction information relating to a transaction is being downloaded, contrary to the recitation of claim 1.

To print coupons, using the system disclosed in Roberts, the system requests coupon data from one of the coupon packages and employs its document generating module to print coupons with bar codes. (Roberts, Col. 7, lines 17-27). Thus, Roberts does not retrieve any images associated with the transaction information, contrary to the recitation of claim 1.

Further, contrary to the Examiner's suggestion, Roberts does not disclose selectively printing pixels corresponding to the pixel matrix representation, as recited in claim 1. The Examiner refers to Roberts' col. 19-21 for support of this rejection. Applicants respectfully

disagree. Col. 19 of Roberts provides a discussion of various methods of stretching the bar code image using various printer resolutions and misalignment factors as well as other factors involved in rendering the bar code image. (Roberts, Col. 19, lines 6-30). There is no discussion in this section of Roberts of selective printing of pixels corresponding to the pixel matrix representation, as recited in claim 1. Further, Col. 20 of Roberts provides discussion of scaling bar code images based on the print area width (e.g., 450 pixels), where scaling is based on the size of the bar code (e.g., 118 pixels) and a multiplication factor based on which the bar code image can be scaled to fit within the print area (e.g., 3 times the 118 pixel to fit within the 450 pixel print area). (Roberts, Col. 20, lines 10-30). Roberts' Cols. 21-22 provide similar discussions of scaling the bar code image by having its pixels straddle on the available space or applying misalignment factors in order to fit the bar code image within the print area. This is clearly different than printing at least one scan line by selectively printing pixels corresponding to the pixel matrix representation, as recited in claim 1.

For the foregoing reasons, Roberts does not disclose every element of claim 1 and claim 1 is not anticipated by Roberts and should be allowed.

Claims 19 and 25 are not anticipated by Roberts for at least the reasons stated above with respect to claim 1. As such, the rejections of claims 19 and 25 are respectfully traversed. The Examiner is requested to reconsider and withdraw his rejection of claims 19 and 25.

Claims 2-9 and 20-23 depend on independent claims 1 and 19 respectively. As such, claims 2-9 and 20-23 are not anticipated by Roberts for at least the reasons stated above with respect to claim 1. Thus, these rejections are respectfully traversed. The Examiner is requested to reconsider and withdraw his rejections of claims 2-9 and 20-23. The Examiner did not provide any rejections of claims 27-37. As such, Applicants assume that these claims are allowed.

Further, these claims are not anticipated by Roberts for at least the reasons stated above with regard to claim 1.

35 U.S.C. 103(a)

In the March 9, 2007 Office Action, the Examiner rejected claims 10-18 and 26 under 35 U.S.C. 103(a) as being unpatentable over Roberts in view of U.S. Patent No. 6,334,109 to Kanevsky et al. (hereinafter, "Kanevsky"). This rejection is respectfully traversed.

Claim 10 recites, *inter alia*, a method of printing a coupon which includes an image, comprising monitoring transaction information; retrieving an image associate with the transaction information; converting the image into a pixel matrix representation; and printing at least one scan line by selectively printing pixels corresponding to the pixel matrix representation.

According to the Examiner, Roberts discloses all of the elements of claim 10 except that it "does not teach monitoring transaction information that relates to a consumer transaction, comparing the information to a database." However, the Examiner asserts that "Kanevsky teaches monitoring user transaction and comparing the transaction to an advertisement database and downloading advertisement information from the database responsive to the match and printing the downloaded advertisement on a receipt or coupon." (See, Office Action, Page 4).

In addition to failing to disclose monitoring transaction information as admitted by the Examiner in the March 9, 2007 Office Action, Roberts fails to disclose, teach or suggest, *inter alia*, retrieving an image associated with the monitored transaction information, converting the image into a pixel matrix representation; and printing at least one scan line by selectively printing pixels corresponding to the pixel matrix representation for at least the reasons stated above with regard to claim 1. Contrary to the Examiner's suggestion, Kanevsky fails to cure the

deficiencies presented by Roberts. Neither Roberts, Kanevsky nor their combination disclose, teach or suggest, *inter alia*, retrieving an image associated with the transaction information, converting the image into a pixel matrix representation, and printing at least one scan line by selectively printing pixels corresponding to the pixel matrix representation, as recited in claim 10. Kanevsky provides customer identity, good/services being purchased and their prices to a local server which relays the data to an advertisement server. (Kanevsky, Col. 5, lines 40-43). Based on the received information and prior history, Kanevsky generates personalized advertisements for a customer. (Kanevsky, Col. 5, lines 44-49). Thus, Kanevsky does not perform any monitoring of transaction information, contrary to the recitation of claim 10. As such, neither Roberts, Kanevsky, nor their combination disclose, teach or suggest all elements of claim 10 and claim 10 should be allowed.

*Improper to Combine References*

Contrary to the Examiner's suggestion (Office Action, page 8), there is still no motivation or suggestion to combine Roberts and Kanevsky to produce the claimed invention. As the Examiner stated Roberts relates to printing coupons using different printer types (Office Action, page 8), however, Roberts does not print coupons based on monitored transaction information. As stated above, Roberts is concerned with stretching, scaling, and/or aligning bar code images of coupons within print area. Roberts' coupon bar codes are imbedded with information relating to the coupon or customer personal information only, rather than a transaction information. In contrast, Kanevsky discloses a system for printing advertisements and as the Examiner stated, there is no teaching that the printed advertisements consist of an image. Further, as pointed out in Applicants' January 3, 2007 Amendment and Response, the technological arts disclosed in Roberts and Kanevsky are different. Specifically, the technology

disclosed in Roberts relates to mechanical characteristics of a printer (size, resolution, etc.). (Class 358/1.2). In contrast, the technology disclosed in Kanevsky relates to financial aspects of distributing coupons (Class 705/14). Thus, the two references and their respective technologies significantly differ from each other and provide no basis as to why they would be combined. Hence, it is improper to combine Roberts and Kanevsky without some disclosed motivation other than the present application. See, MPEP 2143.01:

“There are three possible sources for a motivation to combine references: the nature of the problem to be solved, the teachings of the prior art, and the knowledge of persons of ordinary skill in the art.” *In re Rouffet*, 149 F.3d 1350, 1357, 47 USPQ2d 1453, 1457-58 (Fed. Cir. 1998) (The combination of the references taught every element of the claimed invention, however without a motivation to combine, a rejection based on a prima facie case of obvious was held improper.).

Even if one were to combine Roberts and Kanevsky, the present invention is not realized. The improper combination of Roberts and Kanevsky still fails to disclose, teach or suggest, *inter alia*, retrieving an image associated with transaction information; converting the image into a pixel matrix representation; and printing at least one scan line by selectively printing pixels corresponding to the pixel matrix representation, as recited in claim 10.

Thus, even the improper combination of Roberts and Kanevsky does not render claim 10 obvious. As such, this rejection is respectfully traversed. The Examiner is requested to reconsider and withdraw her rejection of claim 10.

Claims 11-18 depend from independent claim 10. As such, claims 11-18 are patentable over the combination of Roberts and Kanevsky for at least the reasons stated above with respect to claim 10. Thus, the rejections of claims 11-18 are respectfully traversed. The Examiner is requested to reconsider and withdraw her rejections of claims 11-18.

Claim 26 depends from independent claim 25. As such, claim 26 is patentable over the Roberts for at least the reasons stated above with respect to claim 25 (See, discussion of Applicants' traversal of 35 U.S.C. 102(e) rejection over Roberts presented above). Further, Kanevsky does not cure the deficiencies of Roberts as stated above with respect to claim 10. Hence, the rejection of claim 26 is respectfully traversed. The Examiner is requested to reconsider and withdraw her rejection of claim 26.

In the March 9, 2007 Office Action, the Examiner rejected claim 24 under 35 U.S.C. 103(a) as being unpatentable over Kanevsky in view of Roberts. Claim 24 is patentable over the combination of Kanevsky and Roberts for at least the reasons stated above with respect to claims 1 and 10. Thus, the rejection of claim 24 is respectfully traversed. The Examiner is requested to reconsider and withdraw her rejection of claim 24.

Further, new claims 27-37 are patentable over various combinations Roberts and Kanevsky for at least the reasons stated above with regard to claims 10-18, 24 and 26.



CONCLUSION

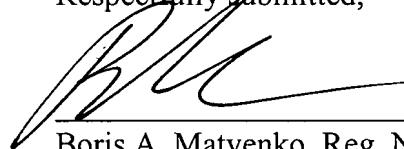
No new matter has been added.

The claims currently presented are proper and definite. Allowance is accordingly in order and respectfully requested. However, should the Examiner deem that further clarification of the record is in order, we invite a telephone call to the Applicants' undersigned attorney to expedite further processing of the application to allowance.

Applicants believe that no additional fees are due with the filing of this Amendment. However, if any additional fees are required or if any funds are due, the USPTO is authorized to charge or credit Deposit Account Number: **50-0311**, Customer Number: **35437**, Reference Number: **27996-030**.

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Respectfully submitted,



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